

Freedom of movement: from right to possibility

Recognition of qualifications through legislation or information

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SUMMARY

This article seeks to describe briefly various initiatives taken to ease recognition and comparison of formal qualifications across borders in the EU. It takes a political angle, from binding legal instruments such as directives and decisions to policy instruments such as recommendations and voluntary action and covers 27 Member States with very different education and training systems and labour market structures. What characterises the various initiatives; what premises are they based on; which problems are they attempting to solve; and where do they possibly fall short? What is the development potential of the latest initiatives?

Key words

Comparability,
harmonisation,
mobility,
regulated
professions,
transparency,
vocational education
and training

This article seeks to describe policy developments: which initiatives have been taken; which are in the pipeline; which problems they solve; and what remains to be done.

One of the fundamental rights set out in the Treaty of Rome is the ‘freedom of movement of workers’ – in a free European market for goods, persons, services and capital. That sounds easy! Especially considering the strong impact that the free trade of goods across European borders has had on our everyday lives: we can buy cheese from Denmark in Greece, Swedish crispbread in Spain, Italian olive oil in Ireland, and wine from the Mediterranean area has become almost an everyday pleasure in countries where grapevines do not thrive at all. We travel on holiday to other European countries with relative ease, and if we are taken ill along the way, we can obtain treatment in the host country without too much trouble.

So why is the inter-European mobility on the labour market still relatively poor? (1). There are many reasons, such as supply and demand of labour, housing, social insurance, jobs for partners, schooling for children, salaries, taxes and, of course, languages. Most of these issues fall outside the scope of this article. The one that will be dealt with is recognition of qualifications in another context than that in which it was originally acquired. The problem is that we are dealing with overlapping fields: education and labour markets; legal regulation (legislation), collective agreements and free competition; supply and demand; and the cultures of education and training and work. Many different forces are all pulling in their own directions. It is not easy for employers to determine the real value of a foreign or unknown diploma. Despite much effort put into solving the problems, results are poor – although efforts have, at least, led to increased mobility of civil servants!

(1) See: European Foundation for the Improvement of Living and Working Conditions. *Mobility in Europe - Analysis of the 2005 Eurobarometer survey on geographical and labour market mobility*. Luxembourg: Office for Official Publications of the European Communities, 2006, p. 71. Available from Internet: <http://www.eurofound.europa.eu/pubdocs/2006/59/en/1/ef0659en.pdf> [cited: 31.8.2007].

Legal regulation: directives and legislation

To obtain an overview, we need to simplify matters; first, we need to look at the legal basis and view post-secondary education and vocational education and training (VET) separately. The Treaty of Rome gives no legal basis for cooperation in education and training matters, but does deal with freedom of establishment and therefore stipulates in Article 47 of the consolidated version ⁽²⁾ that ‘the Council shall [...] issue directives for the mutual recognition of diplomas, certificates and other evidence of formal qualifications’ – however, this can only be done where Member States already regulate the exercise of a profession through legislation.

In the 1960s, this led to liberalisation and a wide range of transitional and industrial, commercial and craft directives (covering several hundred professions) ⁽³⁾. They can be characterised as ‘harmonisation directives’ – as they lay down common minimum education and training (mainly VET) requirements and levels and/or documentation of professional experience for people working in a profession subject to regulation. These directives are hardly used nowadays.

Common minimum requirements also apply – and as such are more interesting at present – to directives on mutual recognition of diplomas (mainly in higher education) which (with subsequent amendments) were issued from 1975 onwards. The so-called ‘sectoral directives’ cover a wide range of medical and paramedical professions (doctors, dental practitioners, veterinary surgeons, nurses, midwives, pharmacists, etc.) as well as architects. As these professions involve health and safety, Member States have a justified interest in setting out specific requirements for pursuing such professions in a legal instrument. Both the above-mentioned types of first generation directives primarily (but not exclusively) concern the right of establishment and freedom to exchange services and thereby, to a high degree, target the liberal professions and self-employed enterprises, although the occupations can also be pursued by employees. The architect directive was in the pipeline for an exceedingly long time (18 years as rumours have it!), as all Member States had to reach

⁽²⁾ Consolidated version of the Treaty establishing the European Community, *Official Journal of the European Union*, C 321, 29.12.2006, p. 37-186 Available from Internet: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2006:321E:0001:0331:EN:pdf> [Cited: 30.8.2007].

⁽³⁾ See: *European Parliament fact sheets: 3.2.3. Freedom of establishment and provision of services and mutual recognition of diplomas*. Available from Internet: http://www.europarl.europa.eu/factsheets/3_2_3_en.htm [cited: 30.8.2007].

agreement before the directive could be adopted. This situation was completely untenable and begged for a more rational procedure than the slow convergence of education and training programmes of Member States.

Next came the 'second generation directives', the 'general directives', which were not concerned with direct professional assessment, but set out a general method for dealing with cases involving mutual recognition of qualifications giving access to a regulated profession in another Member State than the one in which the qualification was obtained. In 1989, the first 'Council directive on a general system for the recognition of higher-education diplomas awarded on completion of professional education and training of at least three years' duration' ⁽⁴⁾ was adopted, giving access to a regulated profession. In 1992, the 'second directive', Council directive on a second general system for the recognition of professional education and training to supplement Directive 89/48/EEC ⁽⁵⁾, saw the light of day. They both set out a minimum duration of education at post-secondary level (more than or less than three years' duration, respectively) giving access to a regulated profession, as well as compensatory measures. First, education and training of shorter duration could be replaced by relevant employment for a specified number of years, in an employed or self-employed capacity. Second, a host Member State not immediately recognising a foreign education or training diploma (duration, professional content) as a precondition for pursuing a regulated profession, must give the applicant the chance to take a skills test or complete (practical) training, or adaptation period in instances where the host Member State establishes substantial shortcomings in the applicant's education and training compared with the requirements in the host Member State. In addition, frameworks are set out for how long it should take to process a case, setting up committees and other practical matters.

The sectoral directives and the two general directives were consolidated in 2005 into one directive of 7 September 2005 ⁽⁶⁾ – the extensive annexes

(4) Council Directive 89/48/EEC of 21 December 1988 on a general system for the recognition of higher-education diplomas awarded on completion of professional education and training of at least three years' duration. *Official Journal of the European Communities* L 19, 24.1.1989, p. 16-23. Available from Internet: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31989L0048:EN:HTML> [cited: 30.8.2007].

(5) Council Directive 92/51/EEC of 18 June 1992 on a second general system for the recognition of professional education and training to supplement Directive 89/48/EEC. *Official Journal of the European Communities* L 209, 24.7.1992, p. 25-45. Available from Internet: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31992L0051:EN:HTML> [cited: 30.8.2007].

(6) Directive 2005/36/EC of the European Parliament and of the Council of 7.9.2005 on the recognition of professional qualifications. *Official Journal of the European Union*, L 255, 30.9.2005, p 22-68. Available from Internet: http://www.cplol.org/files/official%20journal_25520050930en00220142_pp1-47.pdf [cited: 30.8.2007].

describe in detail the (common minimum) qualification requirements for individual (Member States') education and training programmes. All concern qualification requirements (education and training plus documented professional experience, if any) to pursue a regulated profession in a Member State. Education and training are viewed as input oriented, based on parameters such as duration and level of education and training, type of institution, etc.

In general terms, the directives form a legal instrument that presupposes a legal basis in the Treaty as well as a legal basis for pursuing a profession in an individual Member State. It constitutes a heavy top-down instrument, which, if it is to be administered properly, requires fulfilment of a range of preconditions, including readily available information on the purpose, goals and content of the education and training programme, the grading system, etc., in a language understood in the host Member State. The fact that this information is rarely available in its entirety in one place and rarely easily accessible, seldom in a foreign language, and certainly not if education and training were completed several years ago, was an obstacle. The recipient Member State often has difficulties acquiring an overview of the education and training qualifications of an applicant and obtaining relevant documentation and having it translated by a sworn interpreter can be both time-consuming and costly for the applicant.

There are also problems of 'asymmetry' with the general directives. Some Member States have a policy of strong State regulation of access to pursuing a profession, while others largely leave this up to the social partners or professional bodies (in such cases, are they covered by the Directive or not?) – and in yet others there is, by and large, no regulation at all. Certain professions such as education and training opticians, require post-secondary education in some Member States, while the same profession requires VET in others. Some Member States have regulated professions which are not regulated in other Member States, such as hairdressing. In cases where the directive deals with regulated education and training leading to regulated professions, some Member States have elected to allow a large part of their VET programmes to be covered by the directive (Germany), while others with a similar VET system have chosen not to do so (Denmark). The main difficulties in administering the directive(s) could be said to be lack of adequate information on qualifications in other languages, 'asymmetry' of professions covered, and the static character of the instrument itself (in a world of constant change).

Information on and comparability of vocational education and training

For VET, which is much more complex than higher education due to the wide range of (ever developing) qualifications covered and the various national systems of education and training and the labour market structures in which they exist, another approach has also been adopted which, in part, supplements the directives. Since its establishment in 1975, one of the top priorities of Cedefop (the European Centre for the Development of Vocational Training) was to supply information: structured descriptions of Member States' VET systems. This was partly been carried out by publishing and regularly updating a series of Member State monographs and via a 'guide' with brief graphical summaries for all (the then) Member States (now discontinued). Recently, information has been published in 'short descriptions' in conjunction with each new Presidency. However, these describe systems, not programmes. Keeping these publications up to date with the continuous development and adaptation of VET systems is extremely slow and laborious so Cedefop recently set up an Internet-based database: 'eKnowVET', a knowledge management system, which can be updated and in which searches of virtually any kind can be performed. While despite all national differences, university education shares many structural and content-related similarities at European level, VET is highly complex with many different stakeholders and players, and sometimes several different systems in the same Member State. VET programmes are not immediately comparable across national borders – not least because the contexts in which they function are so different.

Another initiative, where Cedefop played a key role ⁽⁷⁾, is implementation of the Council Decision of 1985 on the comparability of vocational training qualifications between Member States of the European Community ⁽⁸⁾ (at skilled level). The decision focuses not on the structure of education and training systems, but on the professional key competences required to perform a specific

⁽⁷⁾ Cedefop. *Certification in the EU Member States* [online]. Available from Internet: <http://www2.trainingvillage.gr/etv/library/certification/main.asp> [cited 30.8.2007].

⁽⁸⁾ Council Decision of 16 July 1985 on the comparability of vocational training qualifications between the Member States of the European Community 85/368/EEC. *Official Journal of the European Communities*, L 199, 31.7.1985, p. 56-59. Available from Internet: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31985D0368:EN:HTML> [cited: 30.8.2007].

⁽⁹⁾ Cedefop. *EU statutory instruments on the recognition and comparability of qualifications* [online]. Available from: <http://www2.trainingvillage.gr/etv/library/certification/bibl.asp> [cited 30.8.2007].

occupation. During the six years of the project, 209 occupations in 19 trades were mapped and described in cooperation with the social partners and relevant national authorities. Results were published in the Official Journal (°) in all nine languages of the then 12 Member States. To simplify comparison, VET programmes were divided into five operational levels, and the educational establishments (school/professional practice) and authorities issuing diplomas, certificates and other evidence of formal qualifications were indicated for reference (for reassessment of the 1985 European Communities five-level structure of training and qualification levels, see Cedefop; Westerhuis, 2001) (10).

Some Member States offer very broad all-round education and training programmes, while programmes in others are narrow – and perhaps highly specialised. A plumber in one Member State handles everything from roofing to heating systems, water installation and drains, while a plumber in another perhaps only handles one of these specialities. Some Member States provide virtually nothing other than school-based training, while others also include a large amount of practical work training/training at the workplace – which means that a newly qualified, skilled worker can immediately function independently. Work on the comparability project brought much useful knowledge to light, but some parties regarded the necessary categorisation of VET programmes as a reduction of programmes to the lowest common denominator, which did not sufficiently consider their specific characteristics. An enormous effort was put into extensive mapping, but it was never really implemented nationally and it is a pity that it has not been possible to maintain the cross-national sectoral networks since work was completed.

Administrative problems

Education and training programmes take place and are described (if at all) in a specific national context. This works as long as a given programme is only used in the context in which it belongs. There is overall legislation at national level; there are special examination rules; there are education and training plans – national, local or perhaps set up by the social partners – and all this in the national language(s). This may be supplemented by a lot of ‘silent

(10) Cedefop-European Centre for the Development of Vocational Training; Westerhuis, Anneke. *European structures of qualification levels - reports on recent developments in Germany, Spain, France, the Netherlands and in the United Kingdom (England and Wales) Volume 2*. Available from Internet http://trainingvillage.gr/etv/Upload/Information_resources/Bookshop/186/5116en.pdf [cited: 31.8.2007].

knowledge' from employers, educational establishments and other stakeholders. Handling cases of recognising or assessing foreign education and training, whether a completed education and training programme for employment or further education and training, or simply parts of education and training programmes (credit transfer), presupposes that relevant information is available so a third party can form an impression not only of the duration and contents, but also of the 'quality' of an education and training programme. This is not easily done, even with help from the guides published by Eurydice ⁽¹¹⁾ and Cedefop ⁽¹²⁾. In the light of the 'knowledge explosion', considerable growth in development and diversification of education and training programmes, and emerging new trades (electronics, IT, biotechnology) – not to mention substantial growth in the number of Member States – the above approach was no longer adequate and, in particular, not sufficiently dynamic and forward-looking to be able to promote mobility in education and training and on the labour market. To be competitive, enterprises are continually updating and thus further development of education and training programmes is required. A static 'subject-to-subject' comparison of qualifications no longer suffices. In 1992 and 1996, the concept of 'transparency' (supplying adequate information for a formal qualification to be understood in another Member State) started to show up in resolutions from meetings of Ministers for Education in the Council. In 1993, the ACVT (the Commission's Advisory Committee on Vocational Training) adopted a resolution on transparency. Small working groups were established and individual pilot projects launched during the following years.

New approach, a paradigm shift

The above initiatives - the directives and the 'comparability project' – make it the responsibility of the 'recipient' to 'recognise' education and training qualifications *de jure* – by allowing pursuit of a profession (for regulated professions) or admission to an educational establishment, or *de facto* – through the applicant getting a job with or without a collective agreement or becoming a member of a trade union. However, the recipient Member State or the 'recog-

(11) Eurydice [February 2007]. *Eurybase - The information database on education systems in Europe* [online]. Available from Internet: http://www.eurydice.org/portal/page/portal/Eurydice/DB_Eurybase_Home [cited: 5.11.2007].

(12) Cedefop. *National VET Systems: Vocational education and training (VET) systems and their development* [online]. Available from Internet: http://www.trainingvillage.gr/etv/Information_resources/NationalVet/ [cited: 5.11.2007].

nising authority' often has no incentive to recognise, and the necessary information is often not available to a sufficient and accessible degree. A diploma, which may be in a foreign language, does not constitute a sufficient basis for assessing an applicant's qualifications.

With the Maastricht Treaty of 1992 ⁽¹³⁾, general education was also covered by the Treaty (Article 126) ⁽¹⁴⁾, and, little by little, efforts to continue work on academic recognition of higher education, which the Council of Europe had handled since its creation shortly after the Second World War, started to take shape in an EU context. First with the Lisbon Convention and subsequently with the Sorbonne, Bologna and Berlin Declarations, the three-step structure for post-secondary education was established. With the Lisbon summit in 2000, the ambitious education and training goals and the 'open method of coordination' (OMC), things began to move.

Now, it is no longer necessary to discuss if there is a legal basis in the Treaty for implementing this or that measure. With the budget guaranteed via education and training programmes, there are funds available to propel the process forward, both with working groups and through pilot projects. With the 'Copenhagen-Maastricht-Helsinki process', and the Education and training 2010 work programme, a new dynamic approach has been introduced. Instead of formal legal 'top-down' instruments, the approach has changed into a political one: ministers agree on common objectives and benchmarks, which both respect national autonomy in educational matters and allow for development and dynamism in both education and labour markets – on a voluntary basis. Thematic working groups have been set up, peer learning activities take place, and thematic clusters support and monitor the process. This has also shown results in recognising both formal and informal qualifications. Further, in the process it has turned out that recognition tools have a role to play, not only in transnational mobility on the labour market, but also as a precondition for lifelong learning in the sense that it covers both credit transfer and academic and professional recognition, thus allowing for geographical, sectoral, vertical and horizontal mobility in and between Member States. In other words, instruments regarded as useful for creating international transparency have also proved useful for regional or sector mobility.

⁽¹³⁾ Treaty on European Union. *Official Journal of the European Union*, C 191, 29.7.1992, p. 1. Available from Internet: <http://eur-lex.europa.eu/en/treaties/dat/11992M/html/11992M.html#0001000001> [cited: 31.8.2007].

⁽¹⁴⁾ Article 126 is now Article 150 in the consolidated version of the Treaty.

The individual as 'carrier of information on own qualifications'

New in the transparency approach is that the burden of proof is being moved from the recipient to the sender. The overriding principle is 'transparency': information, education and training programmes must be described so they are immediately understandable and can be compared with similar programmes in other Member States or with job profiles or competence requirements, so recipients (competent authority, employer) can immediately assess whether applicants comply with requirements and whether any shortcomings are immaterial or so substantial that additional education and/or training is required – or that applicants cannot obtain the benefit they are applying for.

Forum for transparency from 1998

In 1998, the Commission and Cedefop jointly set up a working group consisting of government representatives and representatives of the social partners at European level. It soon became evident there was a need for clear and understandable information on individual education and training programmes and for a network of national information centres from which additional information could be obtained – also on educational establishments, etc. This was implemented and further developed in the 2004 decision⁽¹⁵⁾ on 'Europass', which, among other things, means that, on completion of an education and training programme, graduates have the right to have an explanatory, multilanguage supplement issued with their diploma, a diploma supplement (for post-secondary education) and a 'certificate supplement' for VET programmes, as a kind of 'informative labelling' of education and training programmes. To this can be added the 'Europass CV', which is a common European CV template. For the information to be understood and 'decoded' in another context, it is necessary to adopt common criteria, just as in any other informative labelling. Accordingly several follow-up initiatives were launched to support the process: quality assurance measures, benchmarks,

⁽¹⁵⁾ Decision 2241/2004/EC of the European Parliament and the Council of 15 December 2004 on a single Community framework for the transparency of qualifications and competences (Europass), *Official Journal of the European Union*, L 390, 31.12.2004, p 6-20. Available from Internet: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2004:390:0006:0020:EN:PDF> [cited: 30.8.2007].

and of current interest: EQF, the European qualifications framework. The proposal on EQF divides education and training competences into eight spacious output-oriented level 'boxes', which can form the foundation for comparison and recognition – as opposed to the conventional input-oriented approach (the duration of education and training is an important parameter). The eight levels can be said to be a refinement, a further development, and a combination of the five VET levels from the comparability project with the three levels for post-secondary education from the Bologna Declaration. Further, national Europass centres have been established to handle information and networking tasks. The purpose is, to ease both horizontal and vertical mobility and also assessment of non-formal and informal competence, and to function as a reference framework, or a translation key, between different systems.

Conclusion and perspective

Interesting from a political point of view in this entire process, which for more than 30 years has sought to turn the freedom of movement of workers into practical reality rather than a bureaucratic obstacle course for individual citizens, is that the focus has shifted. From a top-down, cumbersome legal process with directives, national legislation and bureaucracy, and a relatively hard-to-update static system it has become a bottom-up process based on 'soft law', a common (non-binding) agreement between ministers, which Member States can implement on a voluntary basis. Several common and recognisable tools are available, which simplify the work and the procedure: measuring points (eight levels), information tools (Europass instruments ⁽¹⁶⁾, CV, diploma supplement (DS) and certificate supplement (CS) and national information centres offering additional assistance and information if the 'independent' information is insufficient, as well as general interest in quality management of educational systems. The intention is not to ensure a one-to-one comparison – there is still scope for individual assessment in individual cases. Where previously, during the time of the first directives, there may have been a certain degree of protectionism – Member States were not too eager to recognise foreign education and training certificates and diplomas, but preferred 'their own' well-known labour force – the principle of voluntary action now allows for a far greater dynamic.

⁽¹⁶⁾ European Commission. Europass [online]. Available from Internet: http://europass.cedefop.europa.eu/europass/preview.action?locale_id=1

It has been argued that educational and labour market mobility has hitherto not been important across the EU – so what is all the fuss about? This may have changed in recent years, and may have more to do with market conditions than with formal requirements for recognition. However, we only know about the people who did move – and whose cases were treated, and are accordingly registered in the statistics. We do not know about all those who did not move, because it was too complicated, who did not get the position (or the salary) they were qualified for, who did not use their qualifications – or who had to retrain – because their qualifications were not properly recognised. With the new approach and new instruments we have at least the opportunity to let people use their potential if they want to move, either to another country, another occupational field, or to add to their qualifications.

The new approach does not confer rights on individual citizens (as the directives did in a limited number of professions). But Member States, educational systems and educational establishments which understand the importance of quickly and efficiently establishing and carrying through education and training programmes adapted to the requirements of the labour market for well-educated, well-trained and up-to-date manpower without too many heavy formal consultation procedures, will gain a competitive advantage. By using transparency instruments as 'informative labelling', they can both market themselves and their candidates in an international labour market.

The principle of voluntary action does not necessarily lead to a *laissez-faire* attitude. Those who realise there is now free competition in an open market, the provider who is the first to offer the state-of-the-art and cutting edge and is able to 'market' and describe it in relation to the 'client base' – and sell it – has 'won market share', precisely as with other consumer goods. Turning education and training into a market product like this is already in full swing in post-secondary education; many overseas (and some European) universities are marketing themselves in the East – and in Europe – and satellite universities are being established in many new Member States (WTO negotiations).

As with other consumer goods, education and training also need to be marketed and provided with informative labelling, and companies must comply with quality standards and norms, which can be declared (ISO).

EQF forms part of this process. It does not solve the problem of mutual recognition as a precondition for freedom of movement, but it does make it easier – with the aid of modern information technology – to search for and check information, and understand and interpret it, and better still: it allows

for development and dynamism; it is proactive instead of reactive as could be said of the previous approaches. Whether the EQF and other recent tools will be implemented on a large scale nationally and whether they will have a substantial positive impact on mobility in all senses of the word still remains to be seen.

A fly in the ointment ... Employers want to hire candidates who can function in the job as quickly as possible, preferably from day one. The academic labour market is believed to be more internationalised, not only in competences, but also in corporate culture, than many (but not all) companies in the manufacturing, commercial and service sectors. After many years of 'co-existence' with recognition/transparency in an EU context, one might be tempted to ask whether EU education and training initiatives are not, after all, locked away in an 'ivory tower', far removed from the real world. As a rule, VET programmes are planned and executed in close collaboration with the social partners as a guarantee that the programmes reflect the business sector's competence needs. Under the Leonardo da Vinci programme, initiatives have been launched in relation to comparability between trades; they are not applicable 'globally', however, but rather constitute 'harmonisation' between participating parties. Does this lend sufficient flexibility and dynamics to keep up with speedy development in the labour market? It is obvious that the principle of the 'sender' or the 'manufacturer' of qualifications providing information on and informative labelling for its 'product' is highly flexible and equips educational establishments, workers and employers with a solid foundation for assessment, decision-making and possibly for supplementary education and training.

We have seen development from a regulated system with a heavy top-down approach covering a limited number of professions conferring a right to a formalised recognition procedure for individuals to a voluntary, flexible, open, bottom-up approach based on various standardised information tools. If the system works according to plan, it will help citizens to use and develop their potential in education and work in their own country or abroad. But it gives them no rights, and depends on the willingness of national systems to supply the necessary infrastructure, and on the Commission for financing. Whether the voluntary framework will be filled in and used overall is still to be seen.

What if another crucial factor determines whether an applicant with a 'foreign' diploma functions in a workplace – not only his 'instrumental' competence or professional knowledge? What if socialisation in the workplace, corporate culture, work organisation, degree of task-solving independence, hi-

erarchy or autonomy, and other tacit and non-education-related norms are just as crucial to employees' job satisfaction and benefits for the company? What do we know about that? What do multinationals do when they recruit globally? Could we get good advice from their personnel/HRD managers? – Have they been asked about their experience?

And then again, in conclusion, maybe it does not matter as long as the market functions. When a shortage of doctors or plumbers arises (both regulated professions), the number of formal recognitions of foreign diplomas is bound to increase!